

**REMARKS**

The Office Action of November 19, 2003 has been received and its contents carefully noted. Claims 1-45 are currently pending in the instant application of which claims 1, 3, 6, 9, 32, 33 and 34 are independent. In view of the comments provided below, Applicants respectfully request reconsideration and withdrawal of the rejection.

Addressing the cited art rejections, beginning on page 2 of the Office Action, the Examiner rejects claims 1-9 under 35 U.S.C. §103(a) as unpatentable over Applicant's Admitted Prior Art in view of U.S. Patent No. 4,090,219 to Ernstoff et al. (hereinafter "Ernstoff"), and further in view of U.S. Patent No. 4,750,813 to Ohwada et al. (hereinafter "Ohwada") claims 10-31 under 35 U.S.C. §103(a) as unpatentable over Applicant's Admitted Prior Art in view of Ernstoff and Ohwada, further in view of U.S. Patent No. 5,528,262 to McDowall et al. (hereinafter "McDowall"), claims 32-34 under 35 U.S.C. §103(a) as unpatentable over Applicant's Admitted Prior Art in view of Ernstoff and Ohwada and further in view of U.S. Patent No. 5,327,229 to Konno et al. (hereinafter "Konno"), and claims 35-45 under 35 U.S.C. §103(a) as unpatentable over Applicants' Admitted Prior Art in view of Ernstoff, Ohwada, Konno and further in view of McDowall.

Applicants traverse the rejections with respect to claims 1-45. More particularly, it is contended that the proposed combination presented in the Office Action fails to expressly teach or implicitly suggest every limitation of the claimed invention necessary to support *prima facie* obviousness under 35 U.S.C. §103(a).

As previously indicated, independent claim 1 of the claimed invention is directed generally to a driving method for a liquid crystal display comprising, *inter alia*, compressing original video signals by  $1/(3n)$  times in a time axis direction by a n-speed field sequential color signal generation circuit, wherein said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate.

Independent claim 3 of the claimed invention is directed generally to a liquid crystal display, including, *inter alia*, an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein said n-speed field sequential color signal generation circuit comprises thin film transistors formed over said substrate.

Independent claim 6 of the claimed invention is directed generally to a liquid crystal display comprising, *inter alia*, an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein said n-speed field sequential color signal generation circuit comprises thin film transistors formed over said substrate.

Independent claim 9 of the claimed invention is directed generally to a method for driving a liquid crystal display wherein said liquid crystal display comprises a plurality of first thin film transistors formed over a substrate and said n-speed field sequential color signal generation circuit is formed over said substrate.

Independent claims 32-34 of the claimed invention are each directed generally to a method for displaying a liquid crystal display comprising, *inter alia*, compressing original blue video signal entered from outside by  $1/(3n)$  into a blue video signal by an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein n is an integer larger than 2 representing a number of subframes, wherein said n-speed field sequential color signal generation circuit comprises at least one thin film transistor formed over said substrate.

Turning now to the rejection, on page 4 of the Office Action and in response to Applicants' previous response, the basis for the rejection has been amended to include the Ohwada patent and to remove the previously cited Kubota patent from the rejection. With reference to Ohwada, the Examiner is attempting to provide a general teaching directed to the the n-speed field sequential color signal generator, as recited in the independent claims of the present invention. More specifically, the Office Action indicates that:

Ohwada et al. teaches an AM-LCD wherein the display comprises a glass substrate, which is known in the art to have an insulating surface, wherein the active matrix (1), the driver circuits (4, 5), and a voltage-timing transforming circuit (7) and all or part of a timing generating circuit (8) are formed in the form of thin film transistors on a glass substrate

However, after a review of the rejection and the Ohwada patent, Applicants can find no disclosure of an n-speed field sequential generation circuit wherein said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate, as recited in **each** of the independent claims. While the Ohwada patent does appear to disclose a display portion 1 that comprises a transistor circuit consisting of TFT

elements (see column 2, lines 41-49 of Ohwada), there is no specific disclosure that said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate. In fact, there is no detailed discussion of TFT's other than circuit diagram representations depicted in FIGs. 1, 2 and 10-12. Thus, contrary to the Examiner's arguments, none of the prior art documents appear to teach or suggest that the n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate.

Furthermore, Applicants respectfully submit that, even if the references were seen to teach each of the claimed features, there is no proper motivation for their combination. For example, the Ohwada patent is directed to a display device that provides a display having excellent characteristics even if there are distortions in the waveform in the scanning wiring. Ohwada attempts to correct for differing voltages applied to the gate electrode of TFT elements. To solve this problem, Ohwada employs a delaying circuit. On the other hand, the Ernstoff patent is directed to a full color liquid crystal display system. Applicants respectfully submit that one of ordinary skill in the art would not combine these teachings, absent improper hindsight. The courts have repeatedly held that references combined under 35 U.S.C. §103 must include some suggestion or motivation to combine them. Specifically, the "[m]ere fact that the prior art may be modified to produce the claimed invention does not make modification obvious unless prior art suggested the desirability of modification." *In re Fritch*, 23 U.S.P.Q.2d 1780 (Fed.Cir.1992). For this additional reason, Applicants respectfully request reconsideration and withdrawal of the rejection.

Alternatively, if the rejection is maintained, Applicants respectfully request that the Examiner more fully disclose the teaching which are applied to the specific features of the presently claimed invention. Thus, Applicants respectfully submit that independent claims 1, 3, 6, 9 and 32-34 are allowable for at least the reasons described above.

Additionally, Applicants respectfully submit that dependent claims 2, 4, 5, 10-31 and 35-44 are dependent claims each depending from an independent claim. Applicants respectfully submit that each dependent claim is allowable at least for the reasons described above, as well as for reasons of their own.

Because the claimed invention, as presently amended, clearly defines over the prior art of record, Applicants respectfully request reconsideration and withdrawal of the rejection. Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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